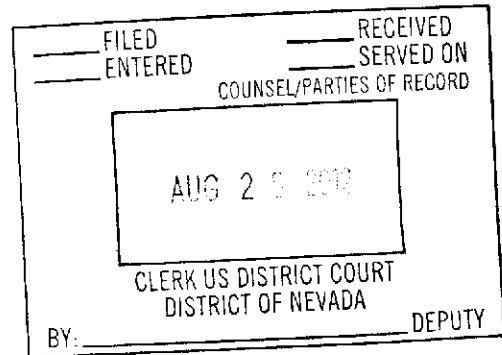


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5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**
8 **-oOo-**
9

10 UNITED STATES OF AMERICA,
11 PLAINTIFF,

12 VS.

13 PAUL WEXLER,

14 DEFENDANT.

SUPERSEDING CRIMINAL INDICTMENT

2:12-cr-060-MMD-VCF

VIOLATIONS:

18 U.S.C. §2422(b) - Coercion and
Enticement;

18 U.S.C. §2252A(a)(2) - Receipt of Child
Pornography;

18 U.S.C. §2252A(a)(5)(B) - Possession of
Child Pornography;

18 U.S.C. §2253 - Criminal Forfeiture

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19 **THE GRAND JURY CHARGES THAT:**

20 **COUNT ONE**
Coercion and Enticement

21
22 Between on or about November 8, 2011 and on or about December 6, 2011,
23 in the State and Federal District of Nevada and elsewhere,

24 **PAUL WEXLER,**

25 defendant herein, did use a facility of interstate commerce to knowingly persuade, induce,
26 and entice, and to attempt to knowingly persuade, induce, and entice an individual who has

1 not attained the age of 18 years to engage in any sexual activity for which any person can
2 be charged with a criminal offense under federal, state and local law, in violation of Title 18,
3 United States Code, Section 2422(b).

4 **COUNT TWO**
5 Receipt of Child Pornography

6 From an unknown time to on or about December 6, 2011, in the State and
7 Federal District of Nevada,

8 **PAUL WEXLER,**

9 defendant herein, did knowingly receive any child pornography, as defined in Title 18, United
10 States Code, Section 2256(8), that had been shipped and transported in and affecting
11 interstate and foreign commerce by any means, including by computer; or that had been
12 shipped and transported using any means and facility of interstate and foreign commerce,
13 in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

14 **COUNT THREE**
15 Possession of Child Pornography

16 From an unknown time to on or about December 6, 2011, in the State and
17 Federal District of Nevada,

18 **PAUL WEXLER,**

19 defendant herein, did knowingly possess material which contains an image of child
20 pornography, as defined in Title 18, United States Code, Section 2256(8), that had been
21 shipped and transported using any means and facility of interstate and foreign commerce;
22 had been shipped and transported in and affecting interstate and foreign commerce; or was
23 produced using materials that had been mailed, shipped and transported in and affecting
24 interstate and foreign commerce, including by computer, in violation of Title 18, United
25 States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

As a result of committing the offenses in violation of Title 18, United States Code, Sections 2422(b), 2252A(a)(2) and 2252A(a)(5)(B), set forth above,

PAUL WEXLER,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253 (a)(3), all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, and 2252A and all items containing such visual depictions, which were transported, shipped and received in violation of Title 18, United States Code, Section 2252A and all property, real and personal, used and intended to be used to commit and promote the commission of the aforestated offense, including but not limited to, the following properties: computer images, including movie files, depicting a minor engaging in sexually explicit conduct and the diskettes and hard drives on which they are maintained.

DATED: this 28th day of August, 2012.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY

DANIEL G. BOGDEN
United States Attorney


NANCY J. KORPE
Assistant United States Attorney